

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LISA RICCOBENE)	
Plaintiff)	
)	
v.)	C.A. No. 04-10256-MEL
)	
MASSACHUSETTS BAY)	
TRANSPORTATION AUTHORITY)	
And)	
ANNE McCALL)	
Defendants)	
)	

JOINT MOTION TO EXTEND PRETRIAL SCHEDULE BY SIXTY DAYS TO
ALLOW PARTIES TO PURSUE SETTLEMENT

The parties to this action, through counsel, hereby respectfully request that the Court extend the pretrial schedule in this case by sixty days.

Specifically, it is requested that the pretrial schedule be extended as follows:

1. Close of fact discovery-extended from February 11, 2007 through April 12, 2007.
2. Date for filing of summary judgment motions-extended from April 6, 2007 through June 5, 2007.
3. Date for filing opposition to summary judgment motions-extended from May 6, 2007 through July 5, 2007.

As grounds for this motion, the parties state that they have commenced settlement discussions and are considering the possibility of attending mediation in order to facilitate settlement. However, should settlement and/or mediation not succeed, the parties will need time to complete discovery (which is ongoing). The additional time requested is needed in order to allow the parties time to both pursue settlement options and have adequate time to complete discovery, if necessary.

For all of the foregoing reasons, it is respectfully requested that this motion be granted, and the pretrial schedule in this case extended as set forth above.

Lisa Riccobene
By her attorney

/s/Mitchell J. Notis

Mitchell J. Notis
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, MA 02445
617-566-2700
BBO# 374360

Massachusetts Bay Transportation Authority
Anne McCall
By their attorneys,

/s/Joseph L. Edwards, Jr.

Walter B. Prince (BBO#406640)
Joseph L. Edwards, Jr. (BBO#564288)
Prince, Lobel, Glovsky & Tye LLP
585 Commercial Street
Boston, MA 02109
617-456-8000

CERTIFICATE OF SERVICE

I, Mitchell J. Notis, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to any non-registered participants as indicated in the Notice of Electronic Filing, this 12th day of January, 2007.

/s/Mitchell J. Notis

MITCHELL J. NOTIS, BBO# 374360
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, MA 02445
Tel: 617-566-2700

